

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

The Roman Catholic Diocese of Syracuse,
New York,

Debtor.

Case No. 20-30663

Chapter 11

**NOTICE OF THE DIOCESE’S IDENTIFICATION OF POTENTIAL
FACT WITNESSES FOR PLAN CONFIRMATION PROCEEDINGS**

PLEASE TAKE NOTICE that on May 2, 2024, The Roman Catholic Diocese of Syracuse, New York (the “Diocese”) and the Official Committee of Unsecured Creditors (the “Committee”, and together with the Diocese, the “Plan Proponents”) filed a revised *Third Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* dated April 16, 2024 (the “Joint Plan”).

PLEASE TAKE FURTHER NOTICE that on May 10, 2024, the Court entered the *Order Setting Confirmation Hearing Schedule for the Third Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* [Docket No. 1880] (the “Scheduling Order”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Scheduling Order, the Diocese and the Committee, as Plan Proponents, hereby identify the following potential fact witnesses in connection with confirmation proceedings related to the Joint Plan:

1. Stephen Breen (Chief Financial Officer);
2. Danielle Cummings (Chancellor); and
3. The Most Reverend Douglas Lucia (Bishop).

PLEASE TAKE FURTHER NOTICE THAT the Plan Proponents reserve the right to introduce one or more, or none of the witnesses listed above. The Plan Proponents further reserve the right to depose or cross-examine any witness called by any other party with respect to the Joint Plan. The Plan Proponents further reserve the right to amend, modify, or otherwise supplement this list based upon additional discovery and rulings concerning evidentiary issues.

Dated: May 22, 2024
Syracuse, New York

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